



**U.S. Department of Justice**  
*United States Attorney*  
*District of New Jersey*

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September 28, 2023

Honorable Kevin McNulty  
United States District Judge  
U.S. Post Office & Federal Courthouse  
Newark, New Jersey 07102

Re: United States v. Gordon Coburn and Steven Schwartz  
Crim. No. 19-120 (KM)

Dear Judge McNulty:

As the Government indicated during the status conference in this matter on September 27, 2023, we are writing to supplement the representations made in the Government's September 26, 2023, letter to the Court regarding an essential witness, Srimanikandan Ramamoorthy.

Late in the morning on September 27, shortly before the status conference, the Government spoke with Indian representatives from the Enforcement Directorate in New Delhi and Chennai, including the officers who are investigating Mr. Ramamoorthy.

According to Indian authorities, they made document requests to Mr. Ramamoorthy months ago and Mr. Ramamoorthy had not complied with the requests as of September 22.

The Government also understands from Indian authorities that Mr. Ramamoorthy told Indian authorities that he wanted to comply with the Indian investigation before coming to the United States to testify. Indian authorities indicated to the Government that prior to Mr. Ramamoorthy voluntarily surrendering his passport September 22, they had no objection to Mr. Ramamoorthy traveling to the United States to testify before he completed cooperation with their investigation. Once Mr. Ramamoorthy surrendered his passport and will be providing documents, Indian authorities must see that process through before they can consider a request from Mr. Ramamoorthy to return his passport.

The Government understands from the Indian authorities that Mr. Ramamoorthy provided a written statement when he voluntarily surrendered his

passport. We have made a request for that statement. Additionally, the Government has requested a follow up call with Indian authorities on September 29, 2023.

Finally, as indicated at the status conference, the Government has raised these issues with counsel for Mr. Ramamoorthy, and is scheduling a follow up conversation with Mr. Ramamoorthy.

Respectfully submitted,

GLENN S. LEON  
Chief

*/s/ Sonali D. Patel*  
*/s/ Gerald M. Moody, Jr.*

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